

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

NEIL SURESH CHANDRAN,

Defendant.

CASE NO: 4:22CR3077

MOTION TO TRANSFER VENUE

The Defendant, Neil Suresh Chandran, hereby moves the Court pursuant to Fed. R. Crim P. 21(b) to transfer this case from the District of Nebraska to the United States District Court for the District of Nevada. In support of this motion, Mr. Chandran states as follows:

1. The District of Nebraska is not the most convenient venue for this case. Rather, the United States District Court for the District of Nevada is a more suitable district for the convenience of the parties, victims and witnesses and is in the interests of justice.

2. The District of Nebraska has virtually no connection to the facts of this case. Most of the witnesses, records, victims and relevant and material events occurred either in Las Vegas, Nevada or outside the District of Nebraska.

3. A brief in support of this motion is filed contemporaneously with this motion.

4. An index of exhibits also is filed contemporaneously with this motion. Included within the index are the affidavits of David R. Stickman and Tawnya Root in support of this motion.

5. Mr. Chandran requests an evidentiary hearing at which time he would present evidence demonstrating that the Court should transfer this case to the District of Nevada.

WHEREFORE, Mr. Chandran respectfully requests that the Court transfer the case from the District of Nebraska to the United States District Court for the District of Nevada.

Respectfully submitted.

NEIL SURESH CHANDRAN, Defendant,

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